

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2017 OCT 30 PM 3:50

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

CLARK'S OFFICE  
BY: \_\_\_\_\_

Name	Lloyd Jermaine James Jr.
Street Address	4740 English Avenue Unit 207-A
City and County	Fort George G. Meade Anne Arundel
State and Zip Code	Maryland 20755
Telephone Number	(347) 308-2620
E-mail Address	LJJAMESJR@GMAIL.COM

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name	Chawntaya C. Wright
Job or Title (if known)	Self-Employed
Street Address	1300 W 19th Street #7040
City and County	Houston Harris
State and Zip Code	Texas 77008
Telephone Number	(832) 724-3206 / (832) 271-7608
E-mail Address (if known)	TAYA@JUSTORGANIZED.ORG

Defendant No. 2

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
Job or Title \_\_\_\_\_  
(if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address \_\_\_\_\_  
(if known) \_\_\_\_\_

*(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

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**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Lloyd Jermaine James Jr., is a citizen of the State of *(name)* New York.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Chawntaya C. Wright, is a citizen of the State of (name) Texas. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

The amount in controversy pertains to potential lost wages and income which would have been earned from sources to include part-time employment as a Government Contractor.

The potential wages and income that would have been earned is more than \$75,000.

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In October 2016, while attending a military course on Lackland Air Force Base in Texas, I was false accused of Sexual Assault by Ms. Chawntaya C. Wright. As a U.S. Marine accused of an offense reportedly committed on a Department of Defense military installation, I was subsequently charged as a suspect, accused of violating Article 120 of the Uniform Code of Military Justice. As a result of Ms. Wright's actions and subsequent investigation, my Personal Identifiable Information (PII) has been entered in various databases, identifying me as a suspect in a Sexual Assault investigation to include the Joint Personnel Adjudication System (JPAS). As a result of the incident report and annotations noted in JPAS pertaining to this false and malicious accusation, I have been denied part-time employment opportunities as a Government Contractor and a fair chance for admission to respective Law Schools as a prospective Law School student. In addition, as a member of the law enforcement community, I am unable to work in an active law enforcement capacity until various agencies have annotated entries and remarks noting that case has been closed due to lack of evidence. Ms. Wright's actions continue to adversely affect future employment opportunities to include applying for and completing my application for the Federal Bureau of Investigation (FBI) Special Agent vacancy. As stated, I was recently notified by my Company Commanding Officer that the charges were dropped due to a lack of evidence. Despite the fact that the charges were dropped, I am waiting for various agencies involved with the case to include the Naval Criminal Investigative Service (NCIS) to enter information in reference to the disposition of the case and removal of my DNA and other PII from databases to include those maintained by the FBI regarding the incident.

#### **IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

I am requesting financial relief based on the fact that Ms. Wright's false and malicious allegations have and continue to affect current and future opportunities to include employment, ability to work actively as a Law Enforcement Official and admission into Law School. I request that the court award compensation as injunctive relief and punitive in nature based previous, current, and future events which cannot be accurately measured.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 30 October, 2017.

Signature of Plaintiff

Printed Name of Plaintiff

Lloyd Jermaine James Jr.  
Lloyd Jermaine James Jr.

*(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)*

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address